

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY (NEWARK)

IN RE:	§	Chapter 11
	§	
BAV AUTO, L.L.C.,	§	CASE NO. 22-17933-JKS
	§	
<i>Debtor.</i>	§	

**APPLICATION TO APPEAR PRO HAC VICE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE JOHN K. SHERWOOD:

Comes now, Auction Credit Enterprises, LLC, through the undersigned counsel, and moves this Court to grant Owen C. Babcock's ("Applicant") admission to the United States Bankruptcy Court for the District of New Jersey (Newark) *pro hac vice* to represent Auction Credit Enterprises, LLC in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and associate of the law firm of Padfield & Stout, LLP, with offices at:

420 Throckmorton Street, Suite 1210  
Fort Worth, Texas 76102  
Telephone: (817) 338-1616  
Facsimile: (817) 338-1610  
Email Address: [obabcock@padfieldstout.com](mailto:obabcock@padfieldstout.com)

2. Since November 2, 2018, Applicant Owen C. Babcock has been and presently is a member of and in good standing with the Bar of the State of Texas. Applicant's Texas bar license number is 24104585.

3. Applicant Owen C. Babcock has been admitted to practice before the following state and federal courts:

<u>Court</u>	<u>Admission date:</u>
Supreme Court of the State of Texas and all state courts presiding in the State of Texas	November 2, 2018
United States District Court for the Northern District of Texas	April 23, 2019

United States District Court for the Eastern District of Texas	October 28, 2021
United States District Court for the Southern District of Texas	December 10, 2021
United States District Court for the Western District of Texas	January 20, 2022

4. Applicant is presently member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court. No disciplinary proceeding is currently proceeding, nor has discipline ever been imposed, against Applicant.

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while members of the bar of any state or federal court.

6. Applicant is eligible to practice in the Bankruptcy Court.

7. Applicant has read and has familiarity with the Local Rules of the United States Bankruptcy Court for the District of New Jersey (Newark) and is also subject to all rules of practice of the United District Court for the District of New Jersey and will comply with the standards of practice set out therein.

8. Applicant has not requested admission *pro hac vice* in the Bankruptcy Court for the District of New Jersey (Newark) in the preceding twelve (12) months.

9. Applicant's admission *pro hac vice* is sponsored by Joseph H. Lemkin (056391994), *Shareholder*, Stark & Stark – Attorneys at Law, 993 Lenox Drive, Lawrenceville, New Jersey 08648.

Wherefore, Applicant prays that this Court enter an order permitting the admission of Owen C. Babcock to the United States Bankruptcy Court for the District of New Jersey (Newark) *pro hac vice* for this case only.

**Respectfully Submitted,**

STARK & STARK  
Attorneys at Law  
993 Lenox Drive  
Lawrenceville, New Jersey 08648  
609-791-7022 – Phone  
609-895-7395 – Fax

/s/ Joseph H Lemkin  
Joseph H. Lemkin, Esq.  
NJ Attorney I.D. #056391994  
jlemkin@stark-stark.com

*Attorney for Auction Credit Enterprises, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2022, I served a true and correct copy of this application upon debtor(s), counsel for debtor(s), and the Trustee in this case via ECF:

BAV Auto L.L.C. 80 Columbia Avenue Kearny, New Jersey 07032 <i>Debtor</i>	Steven D. Pertuz Law Office of Steven D. Pertuz, LLC 111 Northfield Avenue Suite 304 West Orange, New Jersey 07052 <i>Counsel for Debtors</i>
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center, Ste. 2100 Newark, New Jersey 07102 <i>U.S. Trustee</i>	Mark Politan Politan Law, LLC 88 East Main Street #502 Mendham, New Jersey 07945 <i>Trustee</i>
Peter J. D'Auria Office of the US Trustee One Newark Center, Ste. 2100 Newark, New Jersey 07102 <i>Attorney for U.S. Trustee</i>	

/s/ Joseph H Lemkin  
Joseph H. Lemkin, Esq.  
NJ Attorney I.D. #056391994  
jlemkin@stark-stark.com